

# EXHIBIT D

**Certified** Copy

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

SEAN BENNETT, an individual,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.
	)	2:23-cv-02425-
City of Phoenix, a governmental	)	ROS--DMF
entity; American Airlines, Inc.,	)	
a foreign corporation; Officer	)	
Joel Cottrell and Jane Doe	)	
Cottrell, a married couple;	)	
Officer Benjamin Denham and Jane	)	
Doe Denham, a married couple;	)	
Officer Todd Blanc and Jane Doe	)	
Blanc, a married couple; Officer	)	
Peru and Jane Doe Peru, a	)	
married couple; Sergeant Hogan	)	
and Jane Doe Hogan, a married	)	
couple;	)	
	)	
Defendants.	)	
	)	

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THE VIDEOTAPED DEPOSITION OF:

SEAN BENNETT

THURSDAY, JULY 24, 2025

ZOOM VIDEO CONFERENCE, CALIFORNIA

Reported by:  
Denise Talancon  
CSR No. 14047

Sean Bennett, 7/24/2025

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	)	
Defendants.	)	
	)	

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The videotaped deposition of Sean Bennett,  
taken on behalf of the Defendants, before Denise  
Talancon, Certified Shorthand Reporter No. 14047, for the  
State of California, commencing at 9:59 a.m., Thursday,  
July 24, 2025, via Zoom Video Conference in the State of  
California.

Sean Bennett, 7/24/2025

1     **APPEARANCES OF COUNSEL:**

2             **For the Defendant, American Airlines, Inc.:**

3                     **WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**  
4                     **BY: PATRICK J. KEARNS, ESQ.**  
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8                     **PATRICK.KEARNS@WILSONELSER.COM**

9             **For the Plaintiff:**

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16     **ALSO PRESENT:**

17                    **DAVID WRIGHT, VIDEOGRAPHER**  
18                    **MONICA BENNETT**

19  
20  
21  
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23  
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Sean Bennett, 7/24/2025

1 BY MR. KEARNS: 10:58:46

2 Q. Okay. What I will refer to as -- as the 10:58:46

3 incident, that was a series or at least began as a series 10:58:52

4 of flights on American Airlines on Friday August 13th; is 10:58:55

5 that correct? 10:59:01

6 A. That is correct. 10:59:02

7 Q. Okay. I will show you something here, sir. 10:59:03

8 We've -- I'll -- I'll mark it as Exhibit 2. 10:59:11

9 (Deposition Exhibit 2 was marked for 10:59:15

10 identification by the court reporter.) 10:59:15

11 MR. KEARNS: And, for reference, we have it 10:59:18

12 marked, Mr. Woods, as Bennett 118. 10:59:20

13 And I'm just going to show you this quick, sir, 10:59:25

14 to let you know what I'm looking at. But it looks to 10:59:27

15 be -- it looks to be one of the -- like a ticket 10:59:31

16 print-out; right? A confirmation print-out for the 10:59:34

17 flights, and it shows a flight beginning on that Friday 10:59:37

18 from Knoxville, Tennessee, to Chicago, continuing from 10:59:42

19 Chicago then to Phoenix, and then from Phoenix to 10:59:47

20 Anchorage. 10:59:52

21 BY MR. KEARNS: 10:59:53

22 Q. Is that your recollection of your intended 10:59:53

23 travel on that day? 10:59:56

24 A. That would be my recollection, yes. 10:59:57

25 Q. Okay. Do you recall, sir, why it is you were 11:00:03

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1 already trying to get my bag on because she was 11:32:21

2 forcefully coming down the aisle. I didn't want to be 11:32:25

3 put in a choke point where I couldn't get around her. 11:32:30

4 Q. So in light of that, sir, would you agree with 11:32:33

5 me then that you dispute the statements and reports that 11:32:36

6 have been made by the captain and every other flight 11:32:43

7 attendant to issue a statement? 11:32:48

8 A. Yes, sir. 11:32:51

9 Q. You disagree with all of those? 11:32:51

10 A. The ones that you have spoken to me on this 11:32:53

11 right now, yes, I do. 11:32:55

12 Q. And each of their statements about you being 11:32:57

13 non-compliant with the mask, yelling about killing 11:33:01

14 people, things of that nature, you're -- you're disputing 11:33:04

15 all of that? 11:33:07

16 They're all -- they're all lying basically? 11:33:08

17 (Simultaneous crosstalk.) 11:33:14

18 THE WITNESS: Four years of my memory, and I 11:33:14

19 would say, yeah, we're -- we're -- they're lying about 11:33:16

20 this one. 11:33:18

21 MR. KEARNS: Okay. 11:33:20

22 BY MR. KEARNS: 11:33:29

23 Q. Let's go back to the other passenger, the other 11:33:29

24 military veteran, and I -- I don't recall whether he was 11:33:32

25 active duty at the time, but the -- the individual that 11:33:35

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1 you had spoken to that walked off. 11:33:38

2 Do you -- you recall that? 11:33:40

3 A. I do recall that. 11:33:41

4 Q. Okay. My understanding is -- and I can see from 11:33:43

5 the video -- that it appears that he walked with you off 11:33:46

6 the plane? 11:33:50

7 A. Yes, he was -- 11:33:51

8 (Simultaneous crosstalk.) 11:33:53

9 THE WITNESS: What's that? 11:33:53

10 BY MR. KEARNS: 11:33:55

11 Q. I'm sorry. At least close to being off the 11:33:55

12 plane. I don't know, whether he got off or not. 11:33:56

13 A. Yeah, he got off the plane. 11:33:59

14 Q. Okay. Were you able to walk on your own 11:34:01

15 volition? 11:34:04

16 A. Yes, I was able to walk. 11:34:05

17 Q. Okay. Well, what is it -- what is your 11:34:07

18 understanding of what his role was walking you off the 11:34:10

19 plane? 11:34:14

20 A. A sole -- a -- he -- he was out of the military. 11:34:14

21 He saw how bad it was getting back there with them 11:34:19

22 screaming and yelling, and he was trying to be proactive, 11:34:22

23 like hey, we need to get you off the plane. Because, 11:34:26

24 yeah, I know. I'm getting off. I'm getting off. 11:34:29

25 Because when she came up screaming, everybody was mad 11:34:32

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1	back there. The whole back of the plane was screaming.	11:34:34
2	"You getter get off now. You better get the hell off	11:34:38
3	now."	11:34:43
4	I was getting cussed out as I was trying to get	11:34:43
5	around the stewardess, the stewardess that had her	11:34:46
6	uniform on. The other one was just there somewhere at	11:34:49
7	some point along with five other people standing around	11:34:52
8	that looked like they were just trying to find seats on	11:34:55
9	the plane.	11:34:58
10	<b>Q. So he was --</b>	11:35:00
11	A. He had a seat --	11:35:02
12	(Simultaneous crosstalk.)	11:35:05
13	<b>THE WITNESS: What?</b>	11:35:05
14	<b>BY MR. KEARNS:</b>	11:35:06
15	<b>Q. He was trying to help you --</b>	11:35:06
16	A. He was trying to --	11:35:08
17	<b>Q. I'm sorry.</b>	11:35:11
18	A. There wasn't going to be anybody beating me up	11:35:13
19	as I was trying to leave. He saw me trying to leave the	11:35:16
20	plane. That stewardess was in the way, so, I mean, he	11:35:18
21	was coming around. I mean, it was almost like, hey, he's	11:35:21
22	trying to get off. Let him get off.	11:35:25
23	<b>Q. Okay.</b>	11:35:28
24	A. Now, you must know and I must know and my	11:35:28
25	attorney must know that at this point there's about five	11:35:33



Sean Bennett, 7/24/2025

1 of summarize some of this stuff. 11:40:54

2 Would it be fair, sir, you testified earlier 11:40:56

3 that at the point that the people in the plane started 11:40:59

4 getting angry and -- 11:41:04

5 MR. WOODS: Sean, where did you go? 11:41:10

6 THE WITNESS: I'm getting a water that was 11:41:11

7 sitting right here. 11:41:13

8 MR. WOODS: Oh. 11:41:15

9 BY MR. KEARNS: 11:41:16

10 Q. You testified earlier and I -- I took a little 11:41:16

11 note here just of the words, but you said you were at one 11:41:18

12 point -- at one point you were just trying to get off the 11:41:20

13 airplane; right? 11:41:23

14 They said they were going to deboard the whole 11:41:25

15 thing. It sounds like passengers were upset about that, 11:41:27

16 and you at that point you were just trying to get off? 11:41:30

17 A. Yes, sir. 11:41:33

18 Q. Okay. And you were able to walk in your own 11:41:33

19 volition ultimately off the plane. You had a guy walking 11:41:36

20 with you, but you were able to walk on your own? 11:41:39

21 A. Yes. I had another military veteran that took 11:41:41

22 it on his own recourse to walk with me off the plane so I 11:41:45

23 can get off the plane or the -- you know, whatever. 11:41:49

24 Q. Yeah. 11:41:52

25 A. Yes. I left on my own. 11:41:52

Sean Bennett, 7/24/2025

1 airplane under duress the way -- I mean, they're leaving 12:05:04  
2 airplane. Yeah. I don't think you should be screaming 12:05:09  
3 on the airplane like that. Is that what you want to 12:05:13  
4 hear? There you go. 12:05:17

5 **Q. Do you agree with me generally speaking that 12:05:17**  
6 **passengers on a air -- on a commercial aircraft need to 12:05:20**  
7 **comply with federal aviation regulations? 12:05:23**

8 **A. Yes, they do, and I did. To the point so that 12:05:28**  
9 **when they told me they were going to deboard the plane if 12:05:35**  
10 **I didn't leave, I left. Like I took that decision on. 12:05:39**  
11 **Yup, I'm out. And that's the biggest thing that could 12:05:43**  
12 **possibly happen. 12:05:46**

13 **Q. And you wanted to leave at that point? 12:05:47**

14 **A. No. I wanted to get to Alaska safe. 12:05:50**

15 **Q. Well, sure. But you testified that once it got 12:05:52**  
16 **to that point, you were trying to get off the plane? 12:05:55**

17 **A. Once I was told that everybody else was going to 12:05:58**  
18 **have to suffer, yeah, I wanted to be the -- yeah, leave. 12:06:01**

19 **Q. Okay. When you were in the gate area you 12:06:10**  
20 **indicated that you had called your wife and were in the 12:06:13**  
21 **gate area, and then you stated -- and this is consistent 12:06:17**  
22 **with the reports. You stated that you had seen officers 12:06:20**  
23 **come, and you kind of -- I forget exactly what you said, 12:06:25**  
24 **but you -- you kind of indicated that they were probably 12:06:28**  
25 **looking for you? 12:06:30**

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1	Q. Okay. Ben Denham. Okay.	12:07:40
2	And was he the first officer that you -- that	12:07:43
3	you interacted with in anyway at the moment?	12:07:45
4	A. He was first one that hit me.	12:07:47
5	Q. Okay. When you had raised your hands and said I	12:07:51
6	think you're probably looking for me, what happened next?	12:07:55
7	A. I got bulldogged, body slammed, by one of the	12:07:58
8	cops, and then the rest of them just were basically on	12:08:04
9	top of me within five seconds. Maybe ten seconds. There	12:08:22
10	was five of them. At least -- at least four, if not	12:08:22
11	five.	12:08:22
12	Q. Okay. So is it your testimony, sir, that there	12:08:22
13	was no verbal interaction, you didn't have any kind of	12:08:22
14	discussion or statements between you and the officers	12:08:22
15	before you were tackled?	12:08:22
16	A. In fact, I'm pretty sure I had my mask on, too.	12:08:23
17	Go figure.	12:08:29
18	Q. Okay.	12:08:32
19	A. There was no talking and that kind of stuff.	12:08:32
20	They were just rushing and hitting me.	12:08:34
21	Q. So you -- is it your testimony, sir, that you	12:08:37
22	were standing there and the cops ran up to you and just	12:08:39
23	tackled you?	12:08:42
24	A. Yes. The police officers did not -- hi, I'm	12:08:43
25	officer so and so from so and so and so and so. We'd	12:08:47

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1 REPORTER'S CERTIFICATE

2 I, Denise Talancon, CSR No. 14047, a Certified  
3 Shorthand Reporter within and for the State of  
4 California, do hereby certify:

5 That, prior to being examined, the witness  
6 named in the foregoing deposition solemnly stated that  
7 the testimony given in this deposition would be the  
8 truth, the whole truth, and nothing but the truth;

9 That said deposition was taken before me at the  
10 time and place set forth and was taken down by me in  
11 shorthand and thereafter reduced to computerized  
12 transcription under my direction and supervision, and I  
13 hereby certify the foregoing deposition is a full, true,  
14 and correct transcript of my shorthand notes so taken;

15 Further, that is the foregoing pertains to the  
16 original transcript of deposition in a federal case, before  
17 completion of the proceedings, review of the transcript  
18 [X] was [ ] was not requested.

19 I further certify that I am neither counsel  
20 for, nor related to, any party to said action, nor in any  
21 way interested in the outcome thereof.

22 Dated this 15th day of August,  
23 2025, at Los Angeles, California.

24   
25 Denise Talancon, CSR No. 14047